



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGIONAL OFFICE

BIRMINGHAM

3705

MEMORANDUM

DATE: July 16, 1992

SUBJECT: Risk review comments on human health aspects, Olin Corporation, McIntosh Plant NPL Site, Alabama.

FROM: Julie W. Keller *JW Keller*  
Toxicologist

TO: Cheryl Smith  
Remedial Project Manager

THROUGH: Elmer W. Akin, Chief *EWA*  
OHA, WD

Per your request, I have reviewed the **Phase III Sampling and Analysis Plan** document for the NPL Site. My comments provided below are divided into two sections, i.e., (1) comments specifically to you the RPM and (2) comments that, if you concur, can be conveyed verbatim to the party responsible for preparation of the document. To facilitate the verbatim conveyance, I will be pleased to provide on request a copy of this memo via cc: mail.

General Comments to the RPM

It is the policy of the EPA Region IV Office of Health Assessment to require written responses to review comments provided by this office. If a meeting with the PRP is to be held to discuss these comments, we request that written responses be provided prior to such a meeting. We also request that any risk assessment comments received from the State or any other source be provided to the Office of Health Assessment for our site file. If risk comments from sources other than this office are forwarded to the PRP contractor, the source should be clearly identified unless concurrence of this office is sought. In this case, we should formally review these comments and provide you with our response before they are forwarded.

Many comments from two previous memos, both dated April 30, 1992, have not been incorporated into this document. I have restated all appropriate comments in this memo. If I can be of further assistance or if you have any questions please contact me at X1586.

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Comments to be Conveyed to the Responsible Party

The evaluation of the nature and extent of contamination in OU-1 has focused on groundwater and source evaluation. The lack of a surface soil and contaminant migration investigation at this site is significant. Without surface soil sampling (top one foot) and analysis the direct exposure pathways can not be evaluated in the baseline risk assessment. The Sampling and Analysis Plan should be further revised to incorporate the sampling necessary to evaluate the direct exposure pathways.

The presence of non-TCL chlorinated benzenes (i.e., trichlorobenzene and tetrachlorobenzene isomers, pentachlorobenzene, and pentachloronitrobenzene) as Tentatively Identified Compounds (TIC) in groundwater and sediment samples is relevant to this investigation based on Olin's manufacture of pentachloronitrobenzene. These compounds should be added to the contaminants of concern list and future samples collected in all media at the site should be analyzed for these compounds by requesting the analysis in addition to CLP TCL/TAL through special analytical services (SAS). These compounds should be included in the baseline risk assessment since all have reference doses and/or cancer slope factors.

Analysis of samples collected in the lime ponds (Section 4.1.2) should be full scan TCL/TAL as described in Section 4.1.1.

Analysis of samples collected in the two landfills (Section 4.1.3) should be full scan TCL/TAL as described in Section 4.1.1.

Composite samples collected at the Old Plant Landfill Drainage Ditch (Section 4.1.4) should separate surface soil (0-1 foot bls) and subsurface soil (greater than 1 foot bls).

Analysis of groundwater samples collected in the CPA Plant area (Section 4.1.5) should be full scan TCL/TAL as described in Section 4.1.1.

Analysis of samples collected at the Mercury Cell Plant (Section 4.1.6) should be full scan TCL/TAL as described in Section 4.1.1.

Analysis of the composite sample collected at the Well Sand Residue Area (Section 4.1.7) should be full scan TCL/TAL as described in Section 4.1.1.

Analysis of the samples from the Strong Brine Pond (Section 4.1.8) should be full scan TCL/TAL as described in Section 4.1.1.

Analysis of samples collected in the basin (Section 4.2) should include TCL pesticides based on previous sampling results regardless of the origin of the contamination.